

EXHIBIT 9

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,)	
)	
Plaintiff,)	
)	
vs.)	Case No.:
)	3:17-cv-00939-WHA
UBER TECHNOLOGIES, INC.,)	
OTTOMOTTO LLC; OTTO TRUCKING)	
LLC,)	
)	
Defendants.)	

ATTORNEYS' EYES ONLY
VIDEOTAPED DEPOSITION OF ASHEEM LINAVAL
San Francisco, California
Thursday, April 13, 2017
Volume 1

Reported by:
RACHEL FERRIER, CSR No. 6948
Job No. 2594014
PAGES 1 - 92

1 Q Between the time you joined 280 Systems and the
2 time that Uber acquired Otto, please tell me the names
3 of the LiDAR projects that you are aware of at Otto,
4 slash, 280 Systems?

5 A There was Spider and Fuji.

6 Q What's Spider?

7 A Spider was -- Spider was a -- could you be more
8 specific about that? Like --

9 Q You -- you mentioned Spider.

10 My question is: What is it?

11 A It is a LiDAR.

12 Q What kind of LiDAR is it?

13 A It is a LiDAR that we wanted to -- it was a
14 prototype LiDAR.

15 Q How many optical cavities were in the Spider
16 LiDAR?

17 A I don't recall exactly.

18 Q Did it have a single lens for transmit and
19 receive?

20 A No.

21 Q How many lenses did it have?

22 A I don't -- I don't -- I don't clearly recall the
23 configuration of the optical cavity, but I believe --
24 yeah, I don't specifically recall the configuration of
25 the optical cavity.

1 Q Okay. So you can't tell me how many lenses the
2 Spider LiDAR had?

3 A I could only tell you what I suspect it had.

4 Q Okay. So you mentioned Spider and -- Spider and
5 Fuji.

6 There were no other LiDAR designs at Otto; is
7 that correct?

8 A Spider and Fuji were our only two internal LiDAR
9 designs.

10 Q Okay. When did Fuji start?

11 A I don't -- I don't know of an exact date for
12 that.

13 Q Who came up with the name Fuji?

14 A That was Anthony's choice.

15 Q So Anthony was involved in the Fuji project;
16 right?

17 A Anthony was involved in naming the project.

18 Q Was Anthony involved in the Fuji project?

19 A At a high-level, Anthony was -- you know, at sort
20 of a overview level, Anthony was involved with the Fuji
21 project.

22 Q What does that mean?

23 A That means, like, while -- while he wasn't --
24 wasn't really involved with, you know, day-to-day
25 engineering, you know, as -- yeah, he had -- it means he

1 I, the undersigned, a Certified Shorthand
2 Reporter of the State of California, do hereby certify:

3 That the foregoing proceedings were taken before
4 me at the time and place herein set forth; that any
5 witnesses in the foregoing proceedings, prior to
6 testifying, were placed under oath; that a verbatim
7 record of the proceedings was made by me using machine
8 shorthand which was thereafter transcribed under my
9 direction; further, that the foregoing is an accurate
10 transcription thereof.

11 I further certify that I am neither financially
12 interested in the action nor a relative or employee of
13 any attorney or any of the parties.

14 IN WITNESS WHEREOF, I have this date subscribed
15 my name.

16
17 Dated: April 13, 2017
18
19
20
21
22

23 <%signature%>

24 RACHEL FERRIER

25 CSR No. 6948